

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants.

Case No. 2:23-cv-00103-JRG-RSP

JURY DEMANDED

JOINT CLAIM CONSTRUCTION CHART (LOCAL P.R. 4-5(d))

Pursuant to Local Patent Rule 4-5(d), and the Court’s Docket Control Order (Dkt. No. 63), Plaintiff Headwater Research, LLC (“Headwater”) and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Samsung”) (all together, the “Parties”) jointly submit this Joint Claim Construction Chart containing the agreed and disputed claim terms, phrases, or clauses of U.S. Patent Nos. 8,406,733 (the “’733 Patent”); 9,198,117 (the “’117 Patent”); and 9,615,192 (the “’192 Patent”) (collectively, the “Asserted Patents”). A chart identifying the parties’ disputed constructions is attached hereto as Exhibit A, listing the complete language of claims with terms in bold type and separate columns for each party’s proposed construction, pursuant to P.R. 4-5(d). The parties have not agreed upon any constructions.

Dated: June 27, 2024

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CERTIFICATE OF SERVICE

I hereby certify that counsel of record who to have consented to electronic service are being served on June 27, 2024, with a copy of this document via the Court's CM/ECF system.

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